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Attorneys for Darex, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

DAREX, LLC, dba WORK SHARP,
Plaintiff,

Case No.:

v.

COMPLAINT FOR COPYRIGHT
INFRINGEMENT

TOOL ON STORE,

DEMAND FOR JURY TRIAL

Defendant.

Plaintiff Darex, LLC, dba Work Sharp (“Work Sharp” or “Darex”) complains and alleges as follows against Defendant Tool On Store (“TOS” or “Defendant”).

INTRODUCTION

1. This is an action for copyright infringement in violation of 17 U.S.C. § 106 *et seq.*
2. Work Sharp owns exclusive rights in United States Copyright Registration Nos. VA0002223798, VA0002217344, VA0002217308, and VA0002246408 (the “Work Sharp Copyrights”).
3. Defendant has made and used unauthorized reproductions of Work Sharp’s original works which are the subject of the Work Sharp Copyrights.
4. Work Sharp seeks, among other relief, an injunction preventing Defendant from further infringing the Work Sharp Copyrights, and damages or disgorgement of Defendant’s profits from its infringement.

THE PARTIES

5. Darex, LLC, dba Work Sharp is a limited liability company organized and existing under the laws of the State of Oregon with a principal place of business at 210 East Hersey Street, Ashland, OR 97520.
6. Defendant Tool On Store (“TOS”) is a company existing under the laws of Indonesia with a principal place of business at Jl, KH Zainul Arifin, Ruko Ketapang Jaya Jakarta Pusat 10130 Jakarta, Ruko Ketapand Jaya, Indonesia, and doing business through its website at the URL www.tool-on-store.com.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction under 17 U.S.C. § 411(a) (action arising under the Copyright Act); 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1367

(supplemental jurisdiction).

8. This Court has personal jurisdiction over Defendant because Defendant has committed and continues to commit acts of copyright infringement in violation of 17 U.S.C. § 106 *et seq.*, within this district and has expressly targeted its activities toward this district. Defendant has expressly targeted this district with its infringing activities, places infringing products into the stream of commerce with the knowledge or understanding that such products are sold in the State of Oregon and in this district and has shipped products into this district. In addition, the acts of Defendant cause substantial injury to Work Sharp in this district. On information and belief, Defendant derives substantial revenue from its sale of products into this district, expects its actions to have consequences within this district, and derives substantial revenue from interstate commerce expressly targeted at this district. Venue is proper in this district under 28 U.S.C. § 1391(c)(3) because Defendant is a foreign person or corporation subject to personal jurisdiction in this district.

GENERAL ALLEGATIONS

9. Work Sharp is a fourth-generation family-owned company in Ashland, Oregon. For over 40 years, Darex or Work Sharp has been creating industry-leading sharpening tools here in the USA under the brands DRILL DOCTOR and WORK SHARP.

10. Work Sharp began in 1973 in Beecher, Illinois. In 1978, Work Sharp relocated to Ashland, Oregon, where it continues to reside. In 2012, Matthew Bernard became the fourth-generation family owner of the company.

11. Work Sharp exists because of a unique passion for creating exceptional-quality, easy-to-use sharpening tools, to the surprise and delight the customers who buy and use its products. Its ingenious products are designed to keep tools and knives safe and sharp.

12. Work Sharp products include professional-quality drill bit sharpeners sold under

the Drill Doctor® brand, and culinary knife sharpeners, tool and knife sharpeners and other products sold under the Work Sharp® brand.

13. Work Sharp strives to create a positive experience for its customers by selling its products only through authorized retailers that agree to sell its products under appropriate conditions.

14. Unfortunately, unscrupulous companies such as Defendant—who are not an authorized retailer for Drill Doctor® or Work Sharp® products—seek to mislead consumers and obtain and sell its products at a steep discount and without warranties.

15. Defendant is not authorized to sell Drill Doctor® or Work Sharp® products or to use Work Sharp’s copyrighted images in connection with its unauthorized listings and has been asked by Work Sharp to stop selling unauthorized Work Sharp products. Nevertheless, Defendant lists numerous Drill Doctor® and Work Sharp® products and intentionally misuses Work Sharp’s copyrighted materials without permission.

16. Work Sharp has protected numerous photographs of its products with the U.S. Copyright Office. On September 28, 2020, Darex, LLC (dba Work Sharp) obtained U.S. copyright registration (Registration Number VA0002217344 (“’344 Copyright”)) to protect certain photographs, including the photograph depicted below:



17. On September 28, 2020, Darex, LLC (dba Work Sharp) obtained U.S. copyright registration (Registration Number VA0002217308 (“’308 Copyright”)) to protect certain photographs, including the photograph depicted below:



18. On November 19, 2020, Darex, LLC (dba Work Sharp) obtained U.S. copyright registration (Registration Number VA0002223798 (“’798 Copyright”)) to protect certain photographs, including the photograph depicted below:



19. On February 22, 2021, Darex, LLC (dba Work Sharp) obtained U.S. copyright registration (Registration Number VA0002246408 (“’408 Copyright”)) to protect certain photographs, including the photograph depicted below:



20. Although Defendant is not authorized to use Work Sharp's copyrighted images, Defendant misappropriates the copyrighted images above to offer and sell unauthorized products, as shown below:

'344 Copyright



(Exhibit A)

Tool-On-Store Infringement

TOOL ON STORE Search \$0.00
[Advanced Search](#) [Search Tips](#)

AIR TOOLS + COMPRESSORS GENERATORS LAWN + GARDEN LOGGING MATERIAL HANDLING POWER TOOLS PRESSURE WASHERS

Home > Sharpeners > Accessories > Work Sharp Tool Sharpener, Model# WS3000

WORK SHARP TOOL SHARPENER, MODEL# WS3000

Price: **\$67.13**

Brand: Work Sharp
Condition: New
Availability: in stock
Shipping: Calculated at checkout
Quantity:

ADD TO CART

Add to Wish List
Click the button below to add the Work Sharp Tool Sharpener, Model# WS3000 to your wish list.

RECENTLY VIEWED

- Work Sharp Knife and Tool Sharpener, Model# WSKTS
★★★★★
\$24.71
- Work Sharp Tool Sharpener, Model# WS3000
★★★★★
\$67.13
- Work Sharp Combo Knife Sharpener, Model# WSCMB
★★★★★
\$17.65
- Work Sharp Replacement Belts — 6-Pk., P80 Coarse, for Work Sharp Knife & Tool Sharpener.

(Exhibit B)

'308 Copyright



(Exhibit C)

Tool-On-Store Infringement

Advanced Search Search Tips
\$0.00

AIR TOOLS + COMPRESSORS
GENERATORS
LAWN + GARDEN
LOGGING
MATERIAL HANDLING
POWER TOOLS
PRESSURE WASHERS

Home > Sharpeners + Accessories > Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO

RECENTLY VIEWED

Work Sharp Combo Knife Sharpener, Model# WSCMB
★★★★★
\$17.65
[Compare](#)

Work Sharp Tool Sharpener, Model# WS3000
★★★★★
\$67.13
[Compare](#)

Work Sharp Knife and Tool Sharpener, Model# WSKTS
★★★★★
\$24.71
[Compare](#)

Work Sharp Replacement Belts — 6-Pk., P80 Coarse, for Work Sharp Knife & Tool Sharpener, Model# WSSA0002703
★★★★★

WORK SHARP KNIFE AND TOOL SHARPENER — KEN ONION EDITION, MODEL# WSKTS-KO

Price: **\$45.91**

Brand: [Work Sharp](#)

Condition: New

Availability: in stock

Shipping: Calculated at checkout

Quantity:

[ADD TO CART](#)

Add to Wish List

Click the button below to add the Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO to your wish list.

[Add to Wish List](#)

(Exhibit D)

'798 Copyright



(Exhibit E)

Tool-On-Store Infringement

Advanced Search Search Tips
\$0.00

[AIR TOOLS + COMPRESSORS](#)
[GENERATORS](#)
[LAWN + GARDEN](#)
[LOGGING](#)
[MATERIAL HANDLING](#)
[POWER TOOLS](#)
[PRESSURE WASHERS](#)

Home > Sharpeners + Accessories > Drill Doctor Drill Bit Sharpener for Split-Point Bits — 3/32in. Dia. to 1/2in. Dia. Bits, Model# DD500X

RECENTLY VIEWED

Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO

★★★★★

\$45.91

☐ Compare

Work Sharp Combo Knife Sharpener, Model# WSCMB

★★★★★

\$17.65

☐ Compare

Work Sharp Tool Sharpener, Model# WS3000

★★★★★

\$67.13

☐ Compare

Work Sharp Knife and Tool Sharpener, Model# WSKTS

★★★★★

\$24.71

☐ Compare

DRILL DOCTOR DRILL BIT SHARPENER FOR SPLIT-POINT BITS — 3/32IN. DIA. TO 1/2IN. DIA. BITS, MODEL# DD500X

Price: **\$35.31**

Brand: Drill Doctor

Condition: New

Availability: In stock

Shipping: Calculated at checkout

Quantity:

ADD TO CART

Add to Wish List

Click the button below to add the Drill Doctor Drill Bit Sharpener for Split-Point Bits — 3/32in. Dia. to 1/2in. Dia. Bits, Model# DD500X to your wish list.

Add to Wish List

(Exhibit F)

'408 Copyright



(Exhibit G)

Tool-On-Store Infringement

Advanced Search Search Tips
\$0.00

[AIR TOOLS + COMPRESSORS](#)
[GENERATORS](#)
[LAWN + GARDEN](#)
[LOGGING](#)
[MATERIAL HANDLING](#)
[POWER TOOLS](#)
[PRESSURE WASHERS](#)

Home > Sharpeners + Accessories > Drill Doctor Diamond Sharpening Wheel — 100-Grit, Model# DA31325GF

RECENTLY VIEWED

Drill Doctor Drill Bit Sharpener for Split-Point Bits — 3/32in. Dia. to 1/2in. Dia. Bits, Model# DD500X
★★★★★
\$35.31
[Compare](#)

Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO
★★★★★
\$45.91
[Compare](#)

Work Sharp Combo Knife Sharpener, Model# WSCMB
★★★★★
\$17.65
[Compare](#)

Work Sharp Tool Sharpener, Model# WSKTS-KO
★★★★★
\$45.91
[Compare](#)

DRILL DOCTOR DIAMOND SHARPENING WHEEL — 100-GRIT, MODEL# DA31325GF

Price: **\$8.83**

Brand: [Drill Doctor](#)

Condition: **New**

Availability: **in stock**

Shipping: **Calculated at checkout**

Quantity:

[ADD TO CART](#)

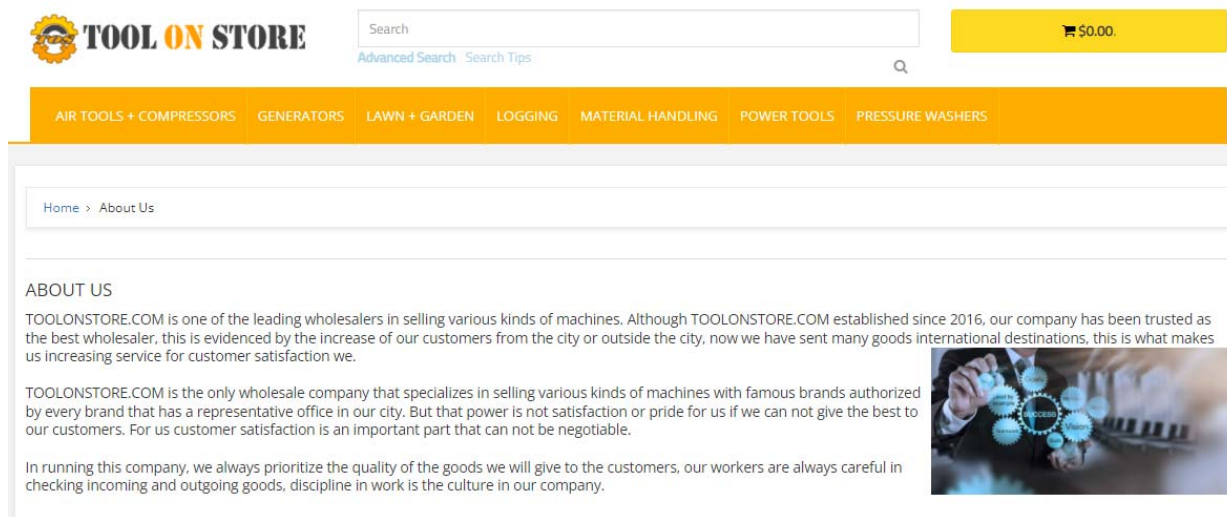
Add to Wish List

Click the button below to add the Drill Doctor Diamond Sharpening Wheel — 100-Grit, Model# DA31325GF to your wish list.

[Add to Wish List](#)

(Exhibit H)


21. Defendant also seeks to mislead customers by advertising to be authorized by or affiliated with the brands it sells, as illustrated by the example below:




(Exhibit I)


22. In addition, TOS seeks to mislead customers by mimicking a specific Work Sharp authorized seller, Northern Tool + Equipment.

23. Depicted below is an authentic product listing for the Work Sharp Knife and Tool Sharpener Ken Onion Edition on www.northerntool.com, operated by Northern Tool + Equipment:


NORTHERN
TOOL + EQUIPMENT


[Categories](#)
[Brands](#)
[Deals](#)



[Northern Tool](#) > [Power Tools](#) > [Sharpeners](#) > [Accessories](#) > [Blade Sharpeners](#) > [Item# 41587](#)
 [Print](#)


Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO

Item# 41587
★★★★★
(237)
[Write a Review](#)
[Ask a Question](#)





Only \$129.95


Free Shipping (Lower 48 states)





 **PayPal** Pay in 4 interest-free payments of \$32.49. [Learn more](#)

[Add to Cart](#)

 **Ship It Free** (Lower 48 States)
In Stock
[See Shipping Options](#)

 **Store Pickup in Under 2hrs** (In-Store or Curbside)
[Check Other Stores](#)
[See Pickup Details](#)


[Video](#)

[More images you'd like to see?](#)

- The 3/4in. x 12in. premium, flexible engineered abrasive belts sharpen virtually any shape or type of knife blade and use a precision sharpening guide to ensure that you get a consistent angle every time
- The sharpening guide is fully adjustable in 1° increments from 15° to 30° so you can sharpen any knife to the angle you desire to best meet your needs
- The variable speed control (1200 SFM to 2800 SFM) provides you with the optimal belt speed for the task at hand

(Exhibit J)

24. Defendant copied this listing nearly verbatim and uses the same color combination of yellow and black, as shown in the exemplary screenshot below:

TOOL ON STORE Search \$0.00

[Advanced Search](#) [Search Tips](#)


AIR TOOLS + COMPRESSORS GENERATORS LAWN + GARDEN LOGGING MATERIAL HANDLING POWER TOOLS PRESSURE WASHERS

Home > Sharpeners + Accessories > Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO

RECENTLY VIEWED

- Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO
★★★★★
\$45.91
☐ Compare
- Work Sharp Tool Sharpener, Model# WS3000
★★★★★
\$67.13
☐ Compare
- Drill Doctor Diamond Sharpening Wheel — 100-Grit, Model# DA31325GF
★★★★★
\$8.83
☐ Compare
- Drill Doctor Drill Bit Sharpener for Split-Point Bits — 3/32in. Dia. to 1/2in. Dia. Bits, Model# DD500X
★★★★★
\$35.31
☐ Compare
- Work Sharp Combo Knife Sharpener, Model# WSCMB
★★★★★
\$17.65
☐ Compare

WORK SHARP KNIFE AND TOOL SHARPENER — KEN ONION EDITION, MODEL# WSKTS-KO



Price: **\$45.91**

Brand: Work Sharp

Condition: New

Availability: in stock

Shipping: Calculated at checkout

Quantity:

ADD TO CART

Add to Wish List

Click the button below to add the Work Sharp Knife and Tool Sharpener — Ken Onion Edition, Model# WSKTS-KO to your wish list.

Add to Wish List

PRODUCT DESCRIPTION

FEATURES + BENEFITS

- The 3/4in. x 12in. premium, flexible engineered abrasive belts sharpen virtually any shape or type of knife blade and use a precision sharpening guide to ensure that you get a consistent angle every time
- The sharpening guide is fully adjustable in 1° increments from 15° to 30° so you can sharpen any knife to the angle you desire to best meet your needs
- The variable speed control (1200 SFM to 2800 SFM) provides you with the optimal belt speed for the task at hand

(Exhibit K)

25. Defendant has successfully deceived numerous U.S. customers regarding its legitimacy and affiliation with famous brands such as Work Sharp, including Randy Loftis and others who ordered products from Defendant that were never delivered:



Search a website...



★☆☆☆☆
tool-on-store.com

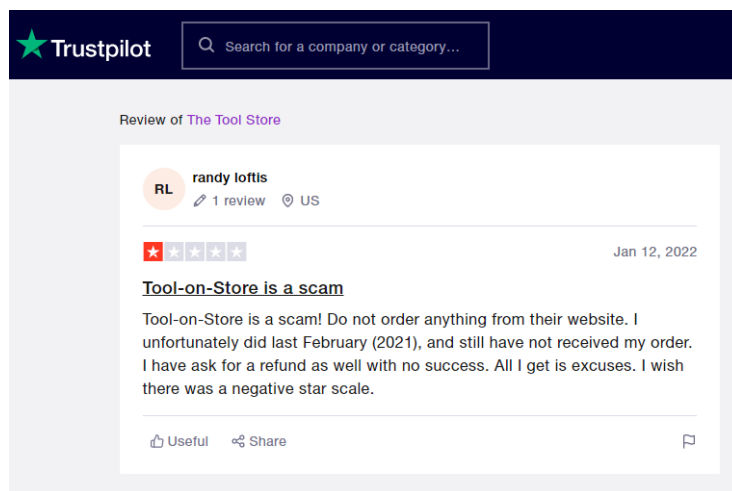
J&K Service

Purchased tool kit from this company and never received it, would not message back anything or reply to there built in message service, sent maybe 50-60 messages and nothing. Buyer beware, don't trust this company, Prices are too good to be true.



★☆☆☆☆
tool-on-store.com

I ordered my product, a wide-blade attachment for a Work Sharp 300, on or about Jan. 5, 2020. Delivery was to be in 3 weeks. I still have not received it and it is now Feb. 10th, 2020. I tried to contact the company through its website but my messages won't go through. I am afraid I am out my \$25. Don't trust this company

READ MORE

(Exhibit L)

26. Defendant operates its fraudulent scheme from Indonesia and has gone to extreme length to conceal its identity.

27. The Defendant advertises shipping times or rates for customers in the United States. (Exhibit L.)

28. The Defendant offers to sell and ship their products to Oregon. The checkout page on Defendant's website includes a dropdown menu listing Oregon as a state to which shipment can be made. (Exhibit L.)

29. The Defendant accepts payments in the United States through PayPal, a U.S.-based payment processor subject to orders of this Court. (Exhibit M).

FIRST CAUSE OF ACTION
Copyright Infringement of U.S. Copyright No. VA0002217344
17 U.S.C. § 106 *et seq.*

30. Work Sharp incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

31. On September 28, 2020, Work Sharp obtained U.S. Copyright Registration No. VA0002217344 (the “’344 Copyright”) to protect numerous product photographs, which is attached as Exhibit A.

32. Work Sharp is the owner of the ’344 Copyright.

33. Defendant has made and used unauthorized reproduction of Work Sharp’s original image(s), which are the subject of the ’344 Copyright.

34. Defendant has produced, reproduced, and/or prepared reproductions of Work Sharp’s protected works without Work Sharp’s consent. Defendant’s acts violate Work Sharp’s exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

35. Defendant’s infringement has been undertaken willfully with the intent to financially gain from Work Sharp’s copyrighted work. Defendant has willfully infringed Work Sharp’s copyrighted works.

36. Because of Defendant’s infringing acts, Work Sharp is entitled to its actual and/or statutory damages and disgorgement of Defendant’s profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

37. Because of Defendant's willful infringement, Work Sharp is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

38. Defendant's infringement has caused and continues to cause irreparable harm to Work Sharp, for which it has no adequate remedy at law. Unless this Court restrains Defendant from infringing Work Sharp's protected work, the harm will continue to occur in the future. Accordingly, Work Sharp is entitled to a preliminary and permanent injunction.

SECOND CAUSE OF ACTION
Copyright Infringement of U.S. Copyright No. VA0002217308
17 U.S.C. § 106 *et seq.*

39. Work Sharp incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

40. On September 28, 2020, Work Sharp obtained U.S. Copyright Registration No. VA0002217308 (the "'308 Copyright") to protect numerous product photographs, which is attached as Exhibit C.

41. Work Sharp is the owner of the '308 Copyright.

42. Defendant has made and used unauthorized reproduction of Work Sharp's original image(s), which are the subject of the '308 Copyright.

43. Defendant has produced, reproduced, and/or prepared reproductions of Work Sharp's protected works without Work Sharp's consent. Defendant's acts violate Work Sharp's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

44. Defendant's infringement has been undertaken willfully with the intent to financially gain from Work Sharp's copyrighted work. Defendant has willfully infringed Work

Sharp's copyrighted works.

45. Because of Defendant's infringing acts, Work Sharp is entitled to its actual and/or statutory damages and disgorgement of Defendant's profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

46. Because of Defendant's willful infringement, Work Sharp is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

47. Defendant's infringement has caused and continues to cause irreparable harm to Work Sharp, for which it has no adequate remedy at law. Unless this Court restrains Defendant from infringing Work Sharp's protected work, the harm will continue to occur in the future. Accordingly, Work Sharp is entitled to a preliminary and permanent injunction.

THIRD CAUSE OF ACTION
Copyright Infringement of U.S. Copyright No. VA000223798
17 U.S.C. § 106 *et seq.*

48. Work Sharp incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

49. On September 28, 2020, Work Sharp obtained U.S. Copyright Registration No. VA000223798 (the "'798 Copyright") to protect numerous product photographs, which is attached as Exhibit E.

50. Work Sharp is the owner of the '798 Copyright.

51. Defendant has made and used unauthorized reproduction of Work Sharp's original image(s), which are the subject of the '798 Copyright.

52. Defendant has produced, reproduced, and/or prepared reproductions of Work Sharp's protected works without Work Sharp's consent. Defendant's acts violate Work Sharp's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights

to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

53. Defendant's infringement has been undertaken willfully with the intent to financially gain from Work Sharp's copyrighted work. Defendant has willfully infringed Work Sharp's copyrighted works.

54. Because of Defendant's infringing acts, Work Sharp is entitled to its actual and/or statutory damages and disgorgement of Defendant's profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

55. Because of Defendant's willful infringement, Work Sharp is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

56. Defendant's infringement has caused and continues to cause irreparable harm to Work Sharp, for which it has no adequate remedy at law. Unless this Court restrains Defendant from infringing Work Sharp's protected work, the harm will continue to occur in the future. Accordingly, Work Sharp is entitled to a preliminary and permanent injunction.

FOURTH CAUSE OF ACTION
Copyright Infringement of U.S. Copyright No. VA0002246408
17 U.S.C. § 106 *et seq.*

57. Work Sharp incorporates and realleges each and every allegation in the preceding paragraphs, as if fully set forth herein.

58. On February 22, 2021, Work Sharp obtained U.S. Copyright Registration No. VA0002246408 (the "'408 Copyright") to protect numerous product photographs, which is attached as Exhibit G.

59. Work Sharp is the owner of the '408 Copyright.

60. Defendant has made and used unauthorized reproduction of Work Sharp's original

image(s), which are the subject of the '408 Copyright.

61. Defendant has produced, reproduced, and/or prepared reproductions of Work Sharp's protected works without Work Sharp's consent. Defendant's acts violate Work Sharp's exclusive rights under the Copyright Act, 17 U.S.C. §§ 106 and 501, including its exclusive rights to produce, reproduce, and distribute copies of its work, to create derivative works, and to publicly display its work.

62. Defendant's infringement has been undertaken willfully with the intent to financially gain from Work Sharp's copyrighted work. Defendant has willfully infringed Work Sharp's copyrighted works.

63. Because of Defendant's infringing acts, Work Sharp is entitled to its actual and/or statutory damages and disgorgement of Defendant's profits attributable to the infringement in an amount to be proved at trial, together with all other relief allowed under the Copyright Act.

64. Because of Defendant's willful infringement, Work Sharp is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2).

65. Defendant's infringement has caused and continues to cause irreparable harm to Work Sharp, for which it has no adequate remedy at law. Unless this Court restrains Defendant from infringing Work Sharp's protected work, the harm will continue to occur in the future. Accordingly, Work Sharp is entitled to a preliminary and permanent injunction.

PRAYER FOR RELIEF

Wherefore, Work Sharp respectfully prays that the Court enter judgment in its favor and award the following relief against Defendant:

A. A judgment in favor of Work Sharp that Defendant has infringed the Work Sharp Copyrights;

B. A judgment in favor of Work Sharp that Defendant's infringement of the Work Sharp Copyrights has been willful;

C. A judgment in favor of Work Sharp that Work Sharp is entitled to its actual damages and/or statutory damages and disgorgement of Defendant's profits attributable to the infringement of the Work Sharp Copyrights, in an amount to be proved at trial;

D. A judgment in favor of Work Sharp that Work Sharp is entitled to increased damages pursuant to 17 U.S.C. § 504(c)(2) due to Defendant's willful infringement;

E. An order and judgment enjoining Defendant and Defendant's officers, directors, employees, agents, licensees, representatives, affiliates, related companies, servants, successors and assigns, and any and all persons acting in privity or in concert with any of them, from further infringing the registered Work Sharp Copyrights;

F. Any other relief the Court deems just and proper under all the circumstances.

Demand for Trial by Jury

Work Sharp demands a jury trial on all matters triable to a jury.

DATED this 3rd day of May, 2022.

Respectfully submitted,

By: s/ Darrel R. Jarvis

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